UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

UNITED STATES OF AMERICA	§
	§
v.	§ Criminal No. 4:20-cr-00048
	§
	§
CRAIG BEASON	§

MOTION FOR CONTINUANCE OF FINAL PRETRIAL, MOTION TO SUPPRESS DEADLINE AND CHANGE OF PLEA DEADLINE

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS:

COMES NOW, Defendant **CRAIG BEASON**, by and through his undersigned attorney, files this his MOTION FOR CONTINUANCE OF, MOTION TO SUPPRESS DEADLINE and PRETRIAL would show unto the Court the following:

I.

PROCEDURAL HISTORY

On the 2nd day of February 2020, the Defendant, Craig Beason was indicted in a five-count indictment. First count alleging a violation of 21 U.S.C. § 846(a)(1) (Conspiracy to possess with the Intent to Distribution of methamphetamine). Second count violation: 21 U.S.C. § 846 (Conspiracy to Possess with Intent to Distribute Heroin). Third count violation: 18 U.S.C. § 2 and 922(g)(1) (Aiding and Abetting and Possession of a Firearm by a Prohibited Person). Fourth count violation 18 U.S.C. § 2 and 924(c) (Aiding and Abetting and Possession of a Firearm in Furtherance of a Drug Trafficking Crime). Fifth count violation 21 U.S.C. § 843(b) (Use of a Communication Facility to Cause or Facilitate a Controlled Substance Offense). On or about April 15, 2020. The current motions deadline is May 11, 2020.

Prior to being indicted on this case, Mr. Beason was indicted on 4:19CR254. That case was assigned to District Judge Amos Mazzant. Mr. Beason has also been indictment in the following case 4:20CR29; 4:20CR31; 4:20CR37 and 4:20CR38 all of pending in Judge Mazzant's Court.

The undersigned has conferred with The Government on the issue of consolidating all these cases. An unopposed motion to transfer and consolidate will be filed in seeking this Court to transfer this case along with 4:20CR48 and 4:20CR55 to Judge Mazzant's Court based on the prior and older 2019 case.

Additionally, Defense Counsel and the Government need additional time to continue to explore and negotiate a possible plea to avoid trials in each of Mr. Beason's cases. Counsel seeks an additional 45 days to accomplish this task.

Due to the reason outlined above, Defendant respectfully requests an additional 45 days for the deadline for filing any motions to suppress, change of plea deadline, and final pretrial conference date.

WHEREFORE PREMISES CONSIDERED, Defendant respectfully requests that the Court grant all relief requested herein.

Respectfully submitted,

/s/ Scott H. Palmer
Scott Palmer
Texas State Bar No. 00797196
15455 Dallas Parkway
Suite 540
Addison Tx, 75001

Attorney for Defendant

CERTIFICATE OF CONFERENCE

I hereby certify that on the 8th day of May 2020 I conferred with Assistance United States Attorney Glen Roque-Jackson who was unopposed to the filing of this motion and the relief sought.

/s/ Scott H. Palmer Scott H. Palmer

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of May 2020, a true and correct copy of the foregoing motion was sent by CM/ECF to:

Glen Roque-Jackson U.S. Attorney's Office EDTX 101 E Park Blvd Suite 500 Plano, TX 75074

> /s/ Scott H. Palmer Scott H. Palmer